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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LEON ATKINS,
9 Plaintiff,
10 vs.
11 EQUIFAX INFORMATION SERVICES, LLC
12 AND CONN CREDIT CORPORATION, INC.,
13 Defendants.

Case No.: 2:23-cv-00316-APG-BNW

**JOINT MOTION TO EXTEND
DEADLINE TO RESPOND TO
PLAINTIFF'S COMPLAINT (FIRST
REQUEST)**

15 Plaintiff, Leon Atkins ("Plaintiff"), and Defendant, Conn Appliances, Inc. ("Defendant")
16 (collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as
17 follows:

18 On February 28, 2023, Plaintiff filed his Complaint [ECF No. 1]. Defendant was served
19 with Plaintiff's Complaint on March 16, 2023. The deadline for Defendant to respond to Plaintiff's
20 Complaint is April 6, 2023. The Parties have discussed extending the deadline for Defendant to
21 respond to Plaintiff's Complaint to allow for better investigation of the allegations and discuss
22 possible resolution of the matter.

23 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Defendant to
24 file its responsive pleading to Plaintiff's Complaint to May 5, 2023.

25 This is the first motion for an extension of time for Defendant to file its responsive
26 pleading. The extension is requested in good faith and is not for purposes of delay or prejudice to
27 any other party.

28 As part of this motion, Defendant agrees to participate in any Rule 26(f) conference that

1 occurs during the pendency of this extension.

2 DATED this 6th day of April, 2023.

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4 WRIGHT, FINLAY & ZAK, LLP

5 /s/ Ramir M. Hernandez

6 Ramir M. Hernandez, Esq.
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FREEDOM LAW FIRM

/s/ Gerardo Avalos

Gerardo Avalos, Esq.
Nevada Bar No. 15171
8985 S. Eastern Ave. Suite 350
Las Vegas, NV 89123
Attorneys for Plaintiff, Leon Atkins

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: April 7, 2023

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and
3 that I served the foregoing **JOINT MOTION TO EXTEND TIME TO RESPOND TO**
4 **PLAINTIFF'S COMPLAINT (FIRST REQUEST)** on the ___ day of April, 2023, to all parties
5 on the CM/ECF service list.

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7 */s/ Lisa Cox*
8 An Employee of WRIGHT, FINLAY & ZAK, LLP
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